

MALLARD BAY LANDING

The Mallard Bay Landing Bulk Plant Site is located at mile marker 193 on the Intercoastal Waterway in the southeast corner of Cameron Parish. Its physical address is 2240 South Talen's Landing Road, Gueydon, in Cameron Parish. The area around the site is sparsely populated, but the boat ramp at Talen's Landing is a major access point to Mallard Bay, the Intercoastal Waterway, and associated marsh areas. The undeveloped areas surrounding the site are primarily open waterways or wetlands.

The facility was constructed in the late 1970's as a crude oil bulk refining facility. Mallard Resources, Inc. (MRI) first operated the plant. Reportedly, the plant could accept a maximum of 5,000 barrels per day of mixed crude oil, and refine it to produce naphtha, diesel, and reduced crude. The facility was assigned a U.S. EPA Hazardous Waste Identification Number as a generator, and as a Treatment, Storage, and Disposal (TSD) facility. This later TSD designation appears to be due to the re-refining of waste oils and slop oils. In 1984, MRI filed for bankruptcy and the facility was sold to Cameron Resources, Inc. (CRI). CRI appears to have operated the site until late 1986 or early 1987 when they also filed for bankruptcy.

In 1987, the former LDEQ Hazardous Waste Division (HWD) made an inspection of the inactive site due to reports that the facility was accepting hazardous wastes, mixing them with oil, and refining the mixture. It had been alleged that the facility had accepted a batch of waste styrene and treated it in this manner. The styrene mixture had reportedly polymerized in the refining process, essentially putting the processing equipment out of commission. The site was subsequently transferred to the former LDEQ Inactive and Abandoned Sites Division (IASD).

LDEQ IASD inspectors made an initial inspection of the site in April 1993. Due to the magnitude of the site, and the lack of viable Potentially Responsible Parties (PRP's), the LDEQ IASD referred the site to the U.S. EPA Superfund Program and requested that it be evaluated for potential listing on the National Priorities List (NPL). In May 1996, a follow-up inspection of the site by LDEQ IASD personnel found site conditions to be deteriorating. Due to this situation, the LDEQ IASD referred the site to the U.S. EPA Removal Program and requested that it be evaluated for a Removal Action (RA). Since 1996, the LDEQ IASD

and the subsequent LDEQ RSD has been active in providing technical assistance to the U.S. EPA in assessing and responding to the site.

In August 1997, the U.S. EPA Removal Program, with the LDEQ-IASD assistance, performed an assessment of the site to determine if it qualified for an EPA RA. Samples taken during this assessment confirmed that there were significant levels of styrene in the wastes at the site. Benzene, toluene, ethyl-benzene, xylene (BTEX), small quantities of asbestos, and various laboratory chemicals were also identified as contaminants of concern. The U.S. EPA began a RA at the site in November 1998. This RA addressed the tank liquids, materials in small containers (drums, porta-feeds, etc.), laboratory chemicals, and process samples. It was discovered during the RA that there were significant amounts of semi-solid materials in the tanks that met criteria for designation as hazardous wastes. These materials could not be addressed under the budget of the RA. Likewise, no contaminated soils, asbestos, potentially contaminated groundwater, process unit or pipe contents were included in the scope of the RA.

At the request of the LDEQ IASD, the U.S. EPA also collected additional samples and information during the RA for determination of NPL eligibility. In December 1999, the U.S. EPA NPL Coordinator informed the LDEQ RSD that the site did meet minimum criteria for NPL Listing. The U.S. EPA requested that the LDEQ RSD obtain a "Governor's Letter" providing the state concurrence for the NPL listing. This was provided by the LDEQ-RSD, and the site was listed on the NPL in July 2000.

From late 2000 to early 2002, the U.S. EPA conducted a Remedial Investigation/Feasibility Study (RI/FS). This work included extensive sampling to determine the extent of contamination, and included a Human Health Risk Assessment (HHRA) and a Screening Level Ecological Risk Assessment. This effort resulted in the identification of a metals-contaminated soil area known as WE-04, the remaining wastes in the tanks, piping, and process units, and friable asbestos as requiring action to eliminate risks. Groundwater was evaluated but found to not be contaminated above risk-based standards.

The U.S. EPA, with the concurrence of the LDEQ RSD, issued an Amended Record of Decision (ROD) in 2003, following public notice and comment period. This decision document identified the following remedial goals: abatement of the friable asbestos; excavation and disposal of all contaminated soils at permitted facilities; demolition and decontamination of all process units, piping, tanks, and buildings; and disposal of tank

sludge via off-site energy recovery/thermal destruction. The Remedial Action was completed as planned by October 2003. The U.S. EPA and LDEQ-RSD are currently involved in the final closeout of the site, to be followed by de-listing it from the NPL. Due to remedial goals being derived from a non-industrial exposure scenario, no further monitoring or land use restrictions will be needed.



Looking southeast at former Process Area



Looking southwest at east tank farm area



Looking southwest at tank waste blending area on east tank farm